

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

Christopher Seaman, et al.,

Plaintiffs,

v.

The Commonwealth of Virginia, et al.,

Defendants.

Case No. 3:22-cv-00006-NKM

Declaration of Marie A. Bauer

I, Marie A. Bauer, declare as follows under penalty of perjury pursuant to 28 U.S.C. § 1746:

Background

1. I am over the age of 18 and a United States citizen. I submit this declaration in support of Plaintiffs' Motion for a Temporary Restraining Order. If called as a witness, I could and would testify competently to the matters set for the below.

2. I am a paralegal at the law firm of Brown Goldstein & Levy, LLP.

3. I researched and obtained the information cited in the Memorandum in Support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction regarding the number of school districts who have maintained or lifted their mask mandates following the issuance of Executive Order 2.

4. To calculate how many Virginia schools continue to require masks, I reviewed the information in the NBC12 news article *Masks in School: Tracking mask mandates by school district*, located at <https://www.nbc12.com/2022/01/24/masks-school-tracking-mask-mandates->


by-school-district/, the information in the Washington Post article *More than half of Virginia's school districts are defying Youngkin's mask-optional order* located at <https://www.washingtonpost.com/education/2022/01/26/virginia-schools-masking-rules/>, and the information in WFXR news article *School districts in southwest and central Virginia address COVID policies after Gov. Youngkin rescinds school mask mandate order* located at <https://www.wfxrtv.com/news/health/coronavirus/school-districts-in-southwest-and-central-virginia-address-covid-policies-after-gov-youngkin-rescinds-school-mask-mandate-order/>.

5. I then went to the school districts' websites to locate their statements regarding the districts' mask mandate policies. I also visited the school districts' Twitter and Facebook accounts to locate statements regarding the districts' mask mandate policies.

6. If I was unable to locate information online for a school district's mask mandate policy, I called the school district and asked them for their current policy.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 9th day of February 2022.


Marie A. Bauer